

ZEICHNER ELLMAN & KRAUSE LLP

1211 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10036  
(212) 223-0400  
FAX: (212) 753-0396  
www.zeklaw.com

35 MASON STREET  
GREENWICH, CT 06830  
(203) 622-0900  
FAX: (203) 862-9889

JANTRA VAN ROY  
(212) 826-5353  
jvanroy@zeklaw.com

103 EISENHOWER PARKWAY  
ROSELAND, NJ 07068  
(973) 618-9100  
FAX: (973) 364-9960

January 13, 2016

**VIA ECF**

Chief Judge Carla E. Craig  
U.S. Bankruptcy Court, EDNY  
Conrad B. Duberstein Courthouse  
271-C Cadman Plaza East - Suite 1595  
Brooklyn, NY 11201-1800

In Re: Hypnotic Taxi LLC. et al.  
Citibank v. Bombshell (Case No. 15-01185)

Dear Judge Craig:

In accordance with your directive in the Decision After Trial (ECF 72), we are submitting a proposed order on behalf of Citibank. The proposed order includes a provision authorizing the US Marshal to levy because the Sheriff of New York County has expressed procedural concerns with levying pursuant to a federal (rather than state) court order. The proposed order also contains a provision extending the Court's November 5, 2015 TRO, as amended, because any transfer or encumbrance of the underlying real estate may effectively render the attachment valueless.

We thank the Court for its attention to this matter.

Very truly yours,

ZEICHNER ELLMAN & KRAUSE LLP

By: /s/ Nathan Schwed  
Nathan Schwed  
Jantra Van Roy

cc: All Counsel by ECF

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re

HYPNOTIC TAXI LLC, et al.,<sup>1</sup>

Citibank, N.A.,

Plaintiff,

- against -

BOMBSHELL TAXI LLC, et al.,

Defendants.

Case No.: 15-43300 (CEC)  
(Jointly Administered)

Adv. Proc. No. 15-01185 (CEC)

**ORDER**

Plaintiff Citibank, N.A. (“Citibank”) having moved by Order to Show Cause on November 5, 2015, seeking, inter alia, an order of attachment, and the Court having entered an Order of Attachment on November 17, 2015 (the “Attachment Order”) (ECF 28), and the Court having issued an order on November 19, 2015 (ECF 34) staying the Attachment Order (the “Stay”), and upon all of the papers and

<sup>1</sup> The Debtors in these cases, along with the last four digits of their federal tax identification numbers are (i) Hypnotic Taxi LLC (6632)(Case No. 15-43300); (ii) Bombshell Taxi LLC (1282)(Case No. 15-43301); (iii) Bourbon Taxi LLC (7155)(Case No. 15-43302); (iv) Butterfly Taxi LLC (6992)(Case No. 15-43303); (v) Candy Apple Taxi LLC (0249)(Case No. 15-43304); (vi) Chianti Taxi, LLC (6799)(Case No. 15-43305); (vii) Chopard Taxi Inc. (0746)(Case No. 15-43306); (viii) Cupcake Taxi LLC (0324)(Case No. 15-43307); (ix) Dorit Transit Inc. (9129)(Case No. 15-43308); (x) France Taxi LLC, (9592)(Case No. 15-43309); (xi) Hennessy Taxi Inc. (4039)(Case No. 15-43310); (xii) Iceberg Taxi Inc. (5877)(Case No. 15-43311); (xiii) Marseille Taxi LLC (9890)(Case No. 15-43312); (xiv) Merlot Taxi LLC (7103)(Case No. 15-43313); (xv) Milkyway Cab Corp. (5061)(Case No 15-43314); (xvi) Palermo Taxi, Inc. (5956)(Case No. 15-43315); (xvii) Pinot Noir Taxi LLC (6725)(Case No. 15-43316); (xviii) Pointer Taxi LLC, (2323)(Case No. 15-43317); (xix) Pudding Taxi Inc. (0432)(Case No. 15-43318); (xx) Stoli Taxi Inc. (4079)(Case No. 15-43319); (xxi) Vodka Taxi LLC (4239)(Case No. 15-43320); and (xxii) VSOP Taxi Inc. (3909)(Case No. 1543321).

proceedings heretofore had herein, and for the reasons set forth in this Court's Decision after Trial entered January 12, 2016,

NOW, therefore it is

ORDERED that the Stay of the Attachment Order is lifted, and Citibank is authorized to attach Evgeny Freidman's ("Freidman") property in accordance with such Attachment Order including without limitation the Real Estate Entities transferred by Freidman to the Kelly Funding Trust, Birkin Funding Trust, Lindy Funding Trust, and Evelyn Funding Trust (the "Trusts") upon it complying with the terms of such Attachment Order; and it is further

ORDERED that references to "Sheriff" in the Attachment Order shall mean United States Marshal or the Sheriff of the City of New York or of any County of the State of New York; and it is further

ORDERED that pursuant to CPLR §6220, Citibank is authorized to inspect the properties owned by the Real Estate Entities and Freidman is directed to cooperate and make such properties available for inspection upon reasonable request by Citibank or its representatives; and it is further

ORDERED that, pursuant to CPLR §6220, Citibank is authorized to obtain disclosure from any other person or entity having knowledge regarding any property in which Freidman has an interest, and any transfers or other disposition of assets made by or on behalf of Freidman since January 1, 2015, including, without limitation, Sandra Freidman (his wife), the former and present trustees or purported

trustees of the Trusts, Ethan Gerber, and corporations and LLCs in which Freidman had an ownership interest; and it is further

ORDERED that the Temporary Restraining Order entered on November 5, 2015, as amended by the Order Amending TRO entered November 16, 2015 (ECF 29) is extended pending further order of this Court.